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July 16, 2019

**By ECF**

Hon. Vernon S. Broderick, U.S.D.J.  
United States District Court, S.D.N.Y.  
40 Foley Square, Room 415  
New York, NY 10007

**Re: *Michael Grecco Productions, Inc. et al. v. Guardian News and Media LLC et al.*,  
No. 19-cv-5672-VSB  
First Request on Consent for Extension of Time To Respond to Complaint**

Dear Judge Broderick:

We represent Defendant Guardian News and Media LLC (“The Guardian”). We write to request that Your Honor extend The Guardian’s time to answer or otherwise respond to Plaintiffs’ Complaint from July 17, 2019 to **August 30, 2019**. There have been no previous requests for extensions of time.

We have noticed our appearance in this action on behalf of The Guardian today. We request this extension so that we can familiarize ourselves with the issues in this case before responding to the Complaint, and to explore possible resolution with Plaintiffs’ counsel.

I have spoken with Plaintiffs’ counsel, Stuart Weichsel of Stropheus LLC, and he has consented to this request. The extension would not affect any appearances before the Court as none have been set.

We appreciate Your Honor’s consideration.

Respectfully submitted,

/s/David S. Korzenik  
David S. Korzenik

CC: Counsel of Record via ECF